

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC., COMEDY)
PARTNERS, COUNTRY MUSIC)
TELEVISION, INC., PARAMOUNT)
PICTURES CORPORATION, and BLACK)
ENTERTAINMENT TELEVISION, LLC,)

Plaintiffs,)

vs.)

YOUTUBE, INC., YOUTUBE, LLC,)
and GOOGLE, INC.,)

Defendants.)

-----)
THE FOOTBALL ASSOCIATION PREMIER)
LEAGUE LIMITED, BOURNE CO., et al.,)
on behalf of themselves and all)
others similarly situated,)

Plaintiffs,)

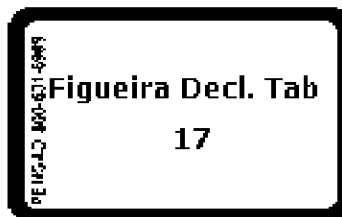
vs.)

YOUTUBE, INC., YOUTUBE, LLC, and)
GOOGLE, INC.,)

Defendants.)

VIDEOTAPED DEPOSITION OF MARYROSE DUNTON
SAN FRANCISCO, CALIFORNIA
FRIDAY, AUGUST 22, 2008

BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CLR
CSR LICENSE NO. 9830
JOB NO. 15500



DUNTON

17-0002

1
2 10:37:27 Q Okay. The third line reads "Accomplishments:

3 10:37:42 Please summarize your overall performance and most
4 10:37:46 significant accomplishments this year."

5 10:37:50 Then you responded "From 2006 through first
6 10:37:53 quarter of 2007 I managed the entire core product
7 10:37:57 development organization which consisted of roughly 35
8 10:38:00 product managers, engineers, user experienced
9 10:38:04 designers and content editors."

10 10:38:08 Is that a correct statement of your duties
11 10:38:12 from 2006 through the first quarter of 2007?

12 10:38:23 A From 2006 to 2007, I did manage a product
13 10:38:30 development organization which consisted of product
14 10:38:33 managers, engineers, designers, and content editors.

15 10:38:39 Q Okay. What do the content editors do?

16 10:38:45 MR. KRAMER: The question is vague.

17 10:38:47 THE WITNESS: Can you be more specific,
18 10:38:48 please?

19 10:38:48 MR. DESANCTIS: Q. Well, you managed content
20 10:38:51 editors; correct?

21 10:38:55 A At a certain point in time, I managed people
22 10:38:59 we referred to as content editors.

23 10:39:02 Q Okay. And I'm asking what the people -- what
24 10:39:04 were the duties of the people who you referred to as
25 10:39:07 "content editors"?

DUNTON

17-0003

1
2 10:39:10 A They were responsible for interacting with
3 10:39:15 the community. They were generally the voice to the
4 10:39:21 community. They were also responsible for choosing
5 10:39:28 videos that would be featured on the YouTube.com
6 10:39:33 Homepage.

7 10:39:33 Q Okay. It also says -- it also includes
8 10:39:50 engineers in the list of employees that you managed.

9 10:39:59 Did you manage all engineers at YouTube
10 10:40:03 between 2006 and the first quarter of 2007?

11 10:40:07 A I did not.

12 10:40:08 Q Okay. Which engineers did you manage?

13 10:40:12 A I managed the engineers who were on the core
14 10:40:17 product team.

15 10:40:19 Q And how many were there?

16 10:40:22 A I cannot tell you.

17 10:40:24 Q Did it change over time?

18 10:40:28 A It -- yes, it changed over time.

19 10:40:32 Q Was Brad Heilbrun one of them?

20 10:40:35 A No.

21 10:40:35 Q Was Matt Rizzo one of them?

22 10:40:37 A Yes.

23 10:40:40 Q Brad Heilbrun was an engineer at YouTube;

24 10:40:43 correct?

25 10:40:44 A Brad Heilbrun is a system administrator at